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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS MOLINA, JHONY SILVA, MARIA ELENA HERNANDEZ, SANDHYA LAMA, TEOFILO MARTINEZ.

Plaintiffs,

VS.

KRISTI NOEM, in her official capacity as Secretary of Homeland Security, UNITED STATES DEPARTMENT OF HOMELAND SECURITY, and UNITED STATES OF AMERICA,

## Defendants.

Case No. 3:25-cv-05687-TLT

## **NOTICE AND REQUEST FOR JUDICIAL NOTICE OF NEW TPS TERMINATION DECISIONS**

Complaint filed: July 7, 2025

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1 Plaintiffs hereby provide notice and request the Court take judicial notice of three  
 2 additional Temporary Protected Status termination decisions issued by Defendants since this  
 3 Court's November 18, 2025 hearing on the parties' cross motions for summary judgment. *See* 90  
 4 Fed. Reg. 58,028 (Dec. 15, 2025) (Ethiopia); 90 Fed. Reg. 53,378 (Nov. 25, 2025) (Burma  
 5 (Myanmar)); 90 Fed. Reg. 54,733 (Nov. 28, 2025) (Haiti). These decisions bring the total number  
 6 of TPS termination decisions since the second Trump Administration took office to thirteen  
 7 terminations for eleven countries (including two terminations each for Venezuela and Haiti). *See*  
 8 90 Fed. Reg. 9040 (Feb. 5, 2025) (Venezuela 2023); 90 Fed. Reg. 20,309 (May 13, 2025)  
 9 (Afghanistan); 90 Fed. Reg. 23,697 (June 4, 2025) (Cameroon); 90 Fed. Reg. 24,151 (June 6,  
 10 2025) (Nepal); 90 Fed. Reg. 28,760 (July 1, 2025) (Haiti); 90 Fed. Reg. 30,089 (July 8, 2025)  
 11 (Honduras); 90 Fed. Reg. 30,086 (July 8, 2025) (Nicaragua); 90 Fed. Reg. 43,225 (Sept. 8, 2025)  
 12 (Venezuela 2021); 90 Fed. Reg. 45,398 (Sept. 22, 2025) (Syria); 90 Fed. Reg. 50,484 (Nov. 6,  
 13 2025) (South Sudan).

14 The new terminations are relevant to Plaintiffs' claim that the terminations challenged in  
 15 this case are "based on [Defendants'] preordained determination to end the TPS program, rather  
 16 than an objective review of country conditions," because they continue Defendants' pattern of  
 17 terminating TPS for every country that has come up for periodic review. Dkt. 73 at 21. *See* Dkt.  
 18 144 at 16-20 (seeking summary judgment on this claim). Further, as notices published in the  
 19 Federal Register, they are properly subject to judicial notice. *Kanfer v. Pharmacare US, Inc.*, 142  
 20 F. Supp. 3d 1091, 1099 (S.D. Cal. 2015) ("The contents of the Federal Register are noticeable as a  
 21 matter of law.") (citing 44 U.S.C. § 1507, which states "[t]he contents of the Federal Register shall  
 22 be judicially noticed").

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2 Date: December 17, 2025  
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Respectfully submitted,

4 NATIONAL DAY LABORER ORGANIZING  
5 NETWORK  
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7 /s/ Jessica Karp Bansal  
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